REMARKS

This Application has been carefully reviewed in light of the Office Action. Applicants appreciate the Examiner's consideration of the Application. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

Section 103 Rejection

The Examiner rejects Claims 1-34 under 35 U.S.C. § 103(a) over U.S. Patent No. 5,699,310 to Garloff et al. ("*Garloff*") as modified by the Examiner. Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that *Garloff* as modified by the Examiner fails to disclose, teach, or suggest the elements of Applicant's claims. For example, *Garloff* fails to disclose, teach, or suggest the following elements recited in independent Claim 1:

> accessing a substantially complete set of domain rules, each domain rule being invariant and expressed as a narrative description;
> defining a domain from the domain rules, the domain used to determine a problem space and a solution space, substantially all solutions of the solution space can be generated from the substantially complete set of domain rules.

Garloff discloses objects and classes used to fully define the functionality and operations of an application:

> The Developer writes the specifications and stores them in the Specifications Knowledge Base. The Specifications Knowledge Base is a concatenated structure that helps a Developer (either the Developer who originally wrote the object, or another Developer) find and re-use the appropriate objects.
> Specifications consist of objects and supporting Classes, Process Models and Functions that are used to fully define the functionality and operations of the application that is being built (the Target Application).

(*Garloff*, col. 4, lines 45-54.) That is, *Garloff* discloses objects and classes used to fully define the functionality and operations of an application, but not rules expressed as a narrative description from which substantially all solutions of a solution space can be generated. Thus, *Garloff* fails to disclose, teach, or suggest the above elements of Claim 1.

For at least these reasons, independent Claims 1 and its dependent claims are allowable under 35 U.S.C. § 103. For analogous reasons, independent Claims 7, 13, 19-21,

25, 29, 33, and 34 and their respective dependent claims are allowable under 35 U.S.C. § 103. Accordingly, Applicants respectfully request reconsideration and allowance of all pending claims

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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Date: October ___/___, 2009

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